

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (GG)
Consolidated with
CIVIL NO. 97-2437 (GG)

**MOTION REQUESTING EXTENSION OF TIME TO ANSWER
PLAINTIFFS' RENEWED MOTION FOR STATUS CONFERENCE
AND PLAINTIFFS' MOTION TO TRANSFER VENUE
OF CASE TO FLORIDA**

TO THE HONORABLE COURT:

NOW COMES co-defendant **Crowley Towing and Transportation Co.** (hereinafter "Crowley"), through the undersigned attorneys, and very respectfully states and prays as follows:

1. On August 18, 2003, the undersigned received Plaintiffs' Renewed Motion for Status Conference to Set Discovery Schedule for Depositions and Documentary Production and Motion to Allow Franklin Jara, Esq. to be Admitted as Co-counsel for Plaintiffs, and Plaintiffs' Motion to Transfer Venue of Case to Florida.

2. Because of previous professional engagements, the undersigned will need twenty (20) additional days within which to file an opposition to plaintiffs' motions. This will push the deadline to September 15, 2003.

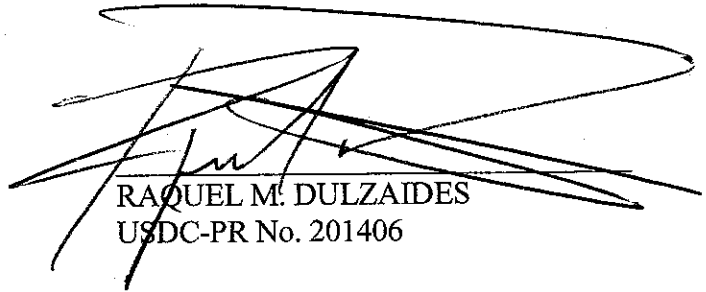
WHEREFORE, it is respectfully requested from this Honorable Court to grant the extension of time herein requested.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of August 2003.

I CERTIFY: That on this same date a true and exact copy of the foregoing document has been sent to **J. H. Zidell**, Esq., City National Bank Building, 300 71st St., Suite 605, Miami Beach, FL 33141; **Ana Rosa Biascoechea**, Esq., P.O. 195332, San Juan, P.R. 00919-5332; **Ellen Silver**, Esq. Seafarers International Union, 5201 Auth Way, Camp Springs, MD 20746; and **Luis A. Suárez**, Esq., Calle Felipe Goyco 503, San Juan, PR 00915.

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